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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Retrieval-Masters Creditors Bureau, Inc.

Case No. 19-23185 (RDD)

Debtor.
-----X

**CERTIFICATE OF NO OBJECTION REGARDING CREDITOR
WAGNER, FERBER, FINE & ACKERMAN, PLLC’S MOTION TO CONFIRM
NO AUTOMATIC STAY IS IN EFFECT AND TO APPROVE THIRD PARTY
PAYMENT TO COMPLETE AND FILE DEBTOR’S 2018 CORPORATE TAX RETURN**

TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to *Creditor, Wagner, Ferber, Fine & Ackerman, PLLC’s Motion to Confirm No automatic Stay is in Effect and to Approve Third Party Payment to Complete and File Debtor’s 2018 Corporate Tax Return* [Docket No. 145] (the “Motion”) filed on September 24, 2019, and served on September 24, 2019 [Docket No. 146].

The undersigned further certifies that he has reviewed the Court’s docket no less than forty-eight (48) hours after expiration of the time to file an objection in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of the Motion, objections to the Motion were to be filed and served no later than October 4, 2019 at 4:00 p.m. (EDT).

It is hereby respectfully requested that the Proposed Order attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: October 9, 2019

Respectfully submitted,

McLAUGHLIN & STERN PLLC

By: /s/ Steven S. Newburgh
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EXHIBIT A

PROPOSED ORDER

McLAUGHLIN & STERN PLLC
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UNITED STATES BANKRUPTCY COURT
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In re:

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**ORDER GRANTING CREDITOR WAGNER, FERBER, FINE & ACKERMAN, PLLC’S
MOTION TO CONFIRM NO AUTOMATIC STAY IS IN EFFECT AND TO
APPROVE THIRD PARTY PAYMENT TO COMPLETE AND FILE
DEBTOR’S 2018 CORPORATE TAX RETURN**

Upon the Creditor, Wagner, Ferber, Fine & Ackerman, PLLC’s (“WFFA”) Motion in the above-captioned case for entry of an order confirming no automatic stay is in effect pursuant to 11 U.S.C. § 362 of the Bankruptcy Code and approving payment to WFFA by Debtor’s principal, Russell Fuchs, to complete and file Debtor’s 2018 corporate tax return; and the Court having reviewed the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue is proper pursuant to 28 U.S.C. § 1409; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion and at the hearing establish just cause for the relief granted herein; and any objections to the relief requested herein having been withdrawn or overruled on

the merits; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The automatic stay pursuant to 11 U.S.C. § 362 does not apply to the receipt by Debtor's former CPA's, Wagner, Ferber, Fine & Ackerman, PLLC of the funds owed by Debtor to said CPA's, by Debtor's principal, Russell Fuchs.
3. The Court approves the agreement between Russell Fuchs and Wagner, Ferber, Fine & Ackerman, PLLC's, as set forth in **Exhibit 1** to their Motion.

Dated: _____, 2019
White Plains, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE